

# EXHIBIT 7

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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MICHAEL DONOGHUE and PREMIUM  
MORTGAGE CORPORATION,

Plaintiffs,

-vs-

CYNTHIA NOSTRO, DYLAN RANDALL,  
DAVID POPHAM, and EVERETT FINANCIAL, INC.  
d/b/a SUPREME LENDING,

Defendants.

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**DEFENDANT EVERETT  
FINANCIAL, INC. D/B/A  
SUPREME LENDING'S  
SECOND REQUEST FOR  
PRODUCTION OF  
DOCUMENTS TO  
PLAINTIFFS**

Case No.  
6:20-cv-06100-EAW

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, defendant Everett Financial, Inc. d/b/a Supreme Lending requests that plaintiffs Michael Donoghue and Premium Mortgage Corporation produce the documents set forth below at the offices of Adams Leclair LLP, 28 E. Main St., Suite 1500, Rochester, New York 14614, within thirty days after service of this request, pursuant to the following Definitions and Instructions.

**Definitions and Instructions**

- A. The Uniform Definitions for All Discovery Requests set forth in Local Civil Rule 26(c) are fully incorporated by reference herein.
- B. The term "Supreme Lending" means defendant Everett Financial, Inc. d/b/a Supreme Lending.
- C. The term "PMC" means Premium Mortgage Corporation and its officers, directors, attorneys, accountants, employees, and any agent acting on its behalf.
- D. The term "Plaintiffs" means either or both of plaintiffs Michael Donoghue and PMC.

E. The term “Defendants” means any of defendants Cynthia Nostro, Dylan Randall, David Popham, or Supreme Lending.

F. The terms “any” and “all” mean both “any” and “all.”

G. The term “including” means “including, without limitation.”

H. The term “Amended Complaint” means the Amended Complaint in this action (Doc. No. 15).

I. The term “Wrongdoing” means all conduct by Defendants for which Plaintiffs seek relief in this action, including all conduct alleged, referenced, or described in paragraph 3 of the Amended Complaint or more specifically alleged elsewhere in the Amended Complaint.

J. The term “Confidential Information” means all information Plaintiffs claim to be protected from disclosure under a written agreement or otherwise and that Defendants misappropriated or improperly used, as alleged in the Amended Complaint, whether referred to in the Amended Complaint as “confidential information,” “confidential material,” “proprietary information,” “confidential and proprietary information,” “non-public information,” “protected information,” “marketing and business information,” “marketing materials,” “PMC systems,” “prospect and client information,” “intellectual property,” “trade secrets,” “secret information,” “data,” or in any other fashion.

K. If Plaintiffs withhold any documents or information under any claim of privilege or for any other reason, provide all information required by Local Civil Rule 26(d). If a claimed privilege applies to only a portion of any information, that portion only should be withheld and the remainder of the information should be produced. As used herein, “claim of privilege” includes, but is not limited to, any claim that information may be withheld from

production by any statute or regulation. If any such claim is asserted, cite each statute or regulation claimed to apply.

L. Plaintiffs are requested to produce any electronically stored information in native format along with reasonably accessible metadata.

M. If Plaintiffs have no documents responsive to a request, state that they performed a good-faith search for responsive documents and concluded that none exist.

### REQUESTS FOR PRODUCTION

1. All documents referenced in, or utilized to provide information for, Plaintiffs' responses to Supreme's interrogatories.

2. Documents concerning reduction or savings in costs or expenses associated with (1) the termination of the individual Defendants' employment with Premium, including documents reflecting the Individual Defendants' compensation during 2018 and 2019 and (2) Plaintiffs' accounting or allocation of costs to revenue, including loan revenue, from 2017 to the present.

DATED: March 17, 2022

ADAMS LECLAIR LLP

By: 

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